

DOCKET	
07-AFC-6	
DATE	JAN 23 2010
RECD.	JAN 29 2010

**CEC Staff Errata Comments
Carlsbad Energy Center Project, 07-AFC-6
Final Staff Assessment, Air Quality**

The following provides minor revisions to the Air Quality Conditions of Certification, as requested by the applicant in their opening testimony and including a few continuity errors discovered by staff. Staff has no issues with the applicant's requested revisions that correct inadvertent continuity errors with the District's FDOC, correct typographical errors, and provide requested clarification to condition verifications. For clarity the entire condition is shown with the revisions in underline and strikethrough and the page numbers listed are based on the revised version of the Air Quality FSA section that was docketed on December 17, 2009.

- Page 4.1-70, Condition of Certification AQ-18

AQ-18 Turbine A is the combustion turbine as described on Applications No. 985745 or No. ~~985747~~, as applicable, that first completes its shakedown period. If both turbines complete their shakedown period on the same date, then Turbine A is the turbine described on Application No. 985745. [Rules 20.1(c)(16) and 21]

Verification: The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

- Page 4.1-70, Condition of Certification AQ-19

AQ-19 Turbine B is the combustion turbine as described on Applications No. 985745 or No. 985747, as applicable, that last completes its shakedown period. If both turbines complete their shakedown period on the same date, then Turbine B is the turbine described on Application No. 985747. [Rules 20.1(c)(16) and 21]

Verification: The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

- Pages 4.1-70 and -71, Condition of Certification AQ-19

AQ-20 Low load operation is a period of time that begins when the gross electrical output (load) of the combustion turbine is reduced below 114 MW and that ends 10 consecutive minutes after the combustion turbine load exceeds 114 MW, provided that fuel is continuously combusted during the entire period and one or more clock hour concentration emission limits specified in this permit are exceeded as a result of the low-load operation. For each combustion turbine, periods of operation at low load shall not exceed 130 unit operating minutes in any calendar day nor an aggregate of 780 unit operating minutes in any calendar year. No low load operation period shall begin during a startup period. [Rule 20.3(d)(1)]

Verification: The project owner shall submit to the CPM the ~~engine-gas turbine~~ operating data demonstrating compliance with this condition on request and shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

- Page 4.1-73, Condition of Certification AQ-29

AQ-29 When a combustion turbine is operating, the emission concentration of carbon monoxide (CO) shall not exceed 2.0 ppmvd corrected to 15 % oxygen, except during commissioning, low load operation, startup, shutdown, or tuning periods for that turbine. For purposes of determining compliance based on CEMS data, the following averaging periods calculated in accordance with the CEMS protocol shall apply:

- a. For any transient hour, a 3-clock-hour average, calculated as the average of the transient hour, the clock hour immediately prior to the transient hour and the clock hour immediately following the transient hour.
- b. For all other hours, a 1-clock-hour average.

[Rule 20.3(d)(1)]

Verification: The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports (**AQ-SC8**).

- Pages 4.1-74 and -75, Condition of Certification AQ-35

AQ-35 For each rolling 30-day-unit-operating-day period, average emission concentration of oxides of nitrogen (NO_x) for each turbine calculated as nitrogen dioxide (NO₂) in parts per million by volume dry (ppmvd) corrected to 15% oxygen or, alternatively, as elected by the project owner, the average NO_x emission rate in pounds per megawatt-hour (lb/MWh) shall not exceed an average emission limit calculated in accordance with 40 CFR Section 60.34804380(b)(3). The emission concentration and emission rate averages shall be calculated in accordance with 40 CFR Section 60.4380(b)(1). The average emission concentration limit and emission rate limit shall be based on an average of hourly emission limits over the 30-day-unit-operating-day period. The hourly emission concentration limit and emission rate limit shall be 15 ppmvd corrected to 15% oxygen and 0.43 lb/MWh, respectively, for clock hours when the combustion turbine load is equal to or greater than 156 megawatts at all times during the clock hour, respectively, and 96 ppmvd corrected to 15% oxygen and 4.7 lb/MWh for all other clock hours when the combustion turbine is operating, respectively. The averages shall exclude all clock hours occurring before the Initial Emission Source Test but shall include emissions during all other times that the equipment is operating including, but not limited to, emissions during low load operation, startup, shutdown, and tuning periods. For each six-calendar-month period, emissions in excess of these limits and monitor downtime shall be identified in accordance with 40 CFR Sections 60.4350 and 60.4380(b)(2), except that Section 60.4350(c) shall not apply for identifying periods in excess of a NO_x concentration limit,

and reported to the District and the federal EPA in accordance with Title V Operating Permit No. 974488. [40 CFR Part 60 Subpart KKKK]

Verification: The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports **(AQ-SC8)**.

- Page 4.1-77, Condition of Certification AQ-43

AQ-43 The carbon monoxide (CO) emissions from each combustion turbine shall not exceed 3813 pounds per hour and total aggregate CO emissions from both combustion turbines combined shall not exceed 4627 pounds per hour measured over each 1-clock hour period. This emission limit shall apply during all times that one or both turbines are operating, including, but not limited to emissions during commissioning, low load operation, startup, shutdown, and tuning periods. [Rule 20.3(d)(2)(i)]

Verification: The project owner shall provide CEMS emissions data to demonstrate compliance with this condition as part of the Quarterly Operation Reports **(AQ-SC8)**.

- Pages 4.1-77 and -78, Condition of Certification AQ-44

AQ-44 Beginning with the earlier of the initial startup dates for either combustion turbine, aggregate emissions of oxides of nitrogen (NO_x), calculated as nitrogen dioxide (NO₂); carbon monoxide (CO); volatile organic compounds (VOCs), calculated as methane; particulate matter less than or equal to 10 microns in diameter (PM₁₀); and oxides of sulfur (SO_x), calculated as sulfur dioxide (SO₂), from the combustion turbines described in District Applications No. 985745 and 985747 and the emergency fire pump described in Application No. 985748, except emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1 (d) (1), shall not exceed the following limits for each rolling 12-calendar-month period:

<u>Pollutant</u>	<u>Emission Limit, tons per year</u>
a. NO _x	72.11
b. CO	339.9
c. VOC	23.7
d. PM ₁₀	39.0
e. SO _x (calculated as SO ₂)	5.6

In addition, beginning with the date on which both turbines have completed their commissioning periods aggregate emissions of CO and VOC from the equipment specified above in this condition shall not exceed 217.3 and 20.1 tons per year, respectively, for each rolling 12-calendar-month period.

The aggregate emissions of each pollutant shall include emissions during all times that the equipment is operating including, but not limited to, emissions

during commissioning, low load operation, startup, shutdown, and tuning periods. [Rules 20.3(d)(3), 20.3(d)(8) and 21]

Verification: The project owner shall submit to the CPM and the District the facility annual operating and emissions data demonstrating compliance with this condition as part of the fourth quarter's Quarterly Operation Reports **(AQ-SC8)**.

- Page 4.1-78, Condition of Certification AQ-45

AQ-45 For each calendar month, the project owner shall maintain records, as applicable, on a calendar monthly basis, of mass emissions during ~~the~~ each calendar month of NO_x (calculated as NO₂), CO, VOCs (calculated as methane), PM₁₀, and SO_x (calculated as SO₂), in tons, from each emission unit described in District Applications No. 985745, 985747, and 985748 , except for emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1 (d) (1). These records shall be made available for inspection within 15 calendar days after the end of each calendar month. [Rules 20.3(d)(3), 20.3(d)(8) and 21]

Verification: The project owner shall provide emissions summary data in compliance with this condition as part of the Quarterly Operation Reports **(AQ-SC8)**. The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

- Page 4.1-80, Condition of Certification AQ-55

AQ-55 The exhaust stacks for each combustion turbine shall be equipped with source test ports and platforms to allow for the measurement and collection of stack gas samples consistent with all approved test protocols. The ports and platforms shall be constructed in accordance with District Method 3A, Figure 2, and approved by the District. Ninety days prior to construction of the turbine stacks the project owner shall provide to the District for written approval detailed plan drawings of the turbine stacks that show the sampling ports and demonstrate compliance with the requirements of this condition. [Rule 20]

Verification: The project owner shall submit to the CPM for review and District for approval a stack test port and platform plan at least ~~60~~ 90 days before the construction of the turbine stacks ~~installation of the stack ports and platform~~.

- Pages 4.1-81 and -82, Condition of Certification AQ-57

AQ-57 A renewal source test and a NO_x and CO Relative Accuracy Test Audit (RATA) ~~test~~ shall be periodically conducted on each combustion turbine to demonstrate compliance with the NO_x, CO, VOC, PM₁₀, and ammonia emission standards of this permit and applicable relative accuracy requirements for the CEMS systems using District approved methods. The renewal source test and the NO_x and CO RATAs shall be conducted in accordance with the applicable RATA frequency requirements of 40 CFR75, Appendix B, Sections 2.3.1 and 2.3.3. The renewal source test shall be

conducted in accordance with a protocol complying with all the applicable requirements of the source test protocol for the Initial Emissions Source Test. [Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]

Verification: The project owner shall submit to the CPM for review and the District for approval the periodic RATA and source test protocols, and RATA source test reports within the timeframes specified in Conditions **AQ-53** and **AQ-54**.

- Page 4.1-84, Condition of Certification AQ-64

AQ-63 The project owner shall comply with the applicable continuous emission monitoring requirements of 40 CFR Part 75. [40 CFR Part 75]

Verification: The project owner shall maintain a copy of the CEMS protocol required by **AQ-65** on site and provide it, other CEMS data, and the CEMS for inspection on request by representatives of the District, ARB, and the Energy Commission.

- Pages 4.1-84 and -85, Condition of Certification AQ-64

AQ-64 A continuous emission monitoring system (CEMS) shall be installed on each combustion turbine and properly maintained and calibrated to measure, calculate, and record the following, in accordance with the District approved CEMS protocol:

- A. Hourly average(s) concentration of oxides of nitrogen (NO_x) uncorrected and corrected to 15% oxygen, in parts per million (ppmvd), necessary to demonstrate compliance with the NO_x limits of this permit;
- B. Hourly average concentration of carbon monoxide (CO) uncorrected and corrected to 15% oxygen, in parts per million (ppmvd), necessary to demonstrate compliance with the CO limits of this permit;
- C. Percent oxygen (O₂) in the exhaust gas for each unit operating minute;
- D. Average concentration of oxides of nitrogen (NO_x) for each continuous rolling 3-hour period, in parts per million (ppmv) corrected to 15% oxygen;
- E. Hourly mass emissions of oxides of nitrogen (NO_x), in pounds;
- F. Cumulative mass emissions of oxides of nitrogen (NO_x) in each startup and shutdown period, in pounds;
- G. Daily mass emissions of oxides of nitrogen (NO_x), in pounds;
- H. Calendar monthly mass emissions of oxides of nitrogen (NO_x), in pounds;
- I. Rolling 30-unit-operating-day average concentration of oxides of nitrogen (NO_x) corrected to 15% oxygen, in parts per million (ppmvd);
- J. Rolling 30-unit-operating-day average oxides of nitrogen (NO_x) emission rate, in pounds per megawatt-hour (MWh);

- K. Calendar quarter, calendar year, and rolling 12-calendar-month period mass emissions of oxides of nitrogen (NO_x), in tons;
- L. Cumulative mass emissions of carbon monoxide (CO) in each startup and shutdown period, in pounds;
- M. Hourly mass emissions of carbon monoxide (CO), in pounds;
- N. Daily mass emission of carbon monoxide (CO), in pounds;
- O. Calendar monthly mass emission of carbon monoxide (CO), in pounds;
- P. Rolling 12-calendar-month period mass emission of carbon monoxide (CO), in tons;
- Q. Average concentration of oxides of nitrogen (NO_x) and carbon monoxide (CO) uncorrected and corrected to 15% ~~percent~~ oxygen, in parts per million (ppmvd), during each unit operating minute;
- R. Average emission rate in pounds per hour of oxides of nitrogen (NO_x) and carbon monoxide (CO) during each unit operating minute.

[Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]

Verification: The project owner shall submit to the CPM for review and the District for approval a CEMS protocol, as required by **AQ-6564**, which includes description of the methods of compliance with the requirements of this condition. The project owner shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.

- Page 4.1-85, Condition of Certification AQ-65

AQ-65 No later than 90 calendar days prior to initial startup of each combustion turbine, the project owner shall submit a CEMS protocol to the District, for written approval that shows how the CEMS will be able to meet all District monitoring requirements. [Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]

Verification: The project owner shall submit to the CPM for review and the District for approval a CEMS operating protocol at least 90 days prior to the initial startup of each combustion turbine ~~operation the CEMS~~.

- Page 4.1-86, Condition of Certification AQ-68

AQ-68 The oxides of nitrogen (NO_x) and oxygen (O₂) components of the CEMS shall be certified and maintained in accordance with applicable Federal Regulations including the requirements of sections 75.10 and 75.12 of title 40, Code of Federal Regulations Part 75 (40 CFR 75), the performance specifications of Appendix A of 40 CFR 75, the quality assurance procedures of Appendix B of 40 CFR 75 and the CEMS protocol approved by the District. The carbon monoxide (CO) components of the CEMS shall be certified and maintained in accordance with 40 CFR 60, Appendices B and F, unless

otherwise specified in this permit, and the CEMS protocol approved by the District. [Rule 69.3, 69.3.1 and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]

Verification: The project owner shall submit to the CPM for review and the District for approval a CEMS protocol, as required by **AQ-6564**, which includes description of the methods of compliance with the requirements of this condition. The project owner shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.

- Page 4.1-86, Condition of Certification AQ-69

AQ-69 The CEMS shall be in operation in accordance with the District approved CEMS protocol at all times when the turbine is in operation a copy of the District approved CEMS monitoring protocol shall be maintained on site and made available to District personnel upon request. [Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]

Verification: The project owner shall make the site available for inspection of records and equipment by representatives of the District, ARB, and the Energy Commission.

- Pages 4.1-87 and -88, Condition of Certification AQ-75

AQ-75 Fuel flowmeters shall be installed and maintained to measure the fuel flow rate, corrected for temperature and pressure, to each combustion turbine. Correction factors and constants shall be maintained on site and made available to the District upon request. The fuel flowmeters shall meet the applicable quality assurance requirements of 40 CFR Part 75, Appendix D, and Section 2.1.6. [Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]

Verification: The project owner shall submit to the CPM the natural gas usage data from the fuel flow meters as part of the Quarterly Operation Report (**AQ-SC8**).

- Page 4.1-88, Condition of Certification AQ-76

AQ-76 Each combustion turbine shall be equipped with continuous monitors to measure, calculate and record unit operating days and hours and the following operational characteristics:

- A. Date and time;
- B. Natural gas flow rate to the combustion turbine during each unit operating minute, in standard cubic feet per hour;
- C. Total heat input to the combustion turbine based the fuels higher heating value during each unit operating minute, in million British thermal units per hour (MMBtu/hr);
- D. Higher heating value of the fuel on an hourly basis, in million British thermal units per standard cubic foot (MMBtu/scf);

- E. Stack exhaust gas temperature during each unit operating minute, in degrees Fahrenheit;
- F. Combustion turbine energy output during each unit operating minute in megawatts hours (MWh); and
- G. Steam turbine energy output during each unit operating minute in megawatts hours (MWh).

The values of these operational characteristics shall be recorded each unit operating minute. The monitors shall be installed, calibrated, and maintained in accordance with a turbine operation monitoring protocol, which may be part of the CEMS protocol, approved by the District, which shall include any relevant calculation methodologies. The monitors shall be in full operation at all times when the combustion turbine is in operation. Calibration records for the continuous monitors shall be maintained on site and made available to the District upon request. [Rules 69.3, 69.3.1, and 20.3(d)(1) and 40 CFR Part 60 Subpart KKKK, and 40 CFR Part 75]

Verification: The project owner shall submit to the CPM for review and the District for approval a turbine operation monitoring protocol in compliance with this condition and within the timeframes specified in **AQ-77** and the project owner shall make the site available for inspection of records and equipment required in this condition by representatives of the District, ARB, and the Energy Commission.

- Page 4.1-91, Condition of Certification AQ-82

AQ-82 Beginning with the initial startup of Turbine A, aggregate emissions of oxides of nitrogen (NO_x), calculated as nitrogen dioxide (NO₂); carbon monoxide (CO); volatile organic compounds (VOCs), calculated as methane; particulate matter less than or equal to 10 microns in diameter (PM₁₀); and oxides of sulfur (SO_x), calculated as sulfur dioxides (SO₂), from Turbine A and the emergency fire pump described in Application No. 985748, except emissions or emission units excluded from the calculation of aggregate potential to emit as specified in Rule 20.1(d)(1), shall not exceed the following limits for each rolling 12-calendar-month period:

<u>Pollutant</u>	<u>Emission Limit, tons per year</u>
a. NO _x	36.05
b. CO	169.95
c. VOC	11.85
d. PM ₁₀	19.5
e. SO _x	2.8

The aggregate emissions of each pollutant shall include emissions during all times that the equipment is operating including, but not limited to, emissions

during commissioning, low load operation, startup, shutdown, and tuning periods. This condition ~~will~~shall not apply on and after the date Turbine B completes its shakedown period. [Rules 20.3(d)(3), 20.3(d)(8) and 21]

Verification: The project owner shall submit to the CPM and the District the facility 12-month rolling operating and emissions data demonstrating compliance with this condition as part of the monthly commissioning status report (**AQ-80**).

- Pages 4.1-91 and -92, Condition of Certification AQ-83

AQ-83 Beginning with the date Turbine A completes its shakedown period, aggregate emissions of carbon monoxide (CO); particulate matter less than or equal to 2.5 microns in diameter (PM_{2.5}); and particulate matter less than or equal to 10 microns in diameter (PM₁₀) from the three utility boilers described on District Permits to Operate No. 791, 792, and 793, shall not exceed the following limits for each rolling 12-calendar-month period:

<u>Pollutant</u>	<u>Emission Limit, tons per year</u>
a. CO	198.75
b. PM _{2.5}	21.80
c. PM ₁₀	26.89

The aggregate emissions of each pollutant shall include emissions during all times that the equipment is operating including, but not limited to, emissions during ~~commissioning, low load operation, startup, shutdown, and tuning periods~~. [Rules 20.3(d)(3), 20.3(d)(8) and 21]

Verification: The project owner shall submit to the CPM and the District the facility 12-month rolling operating and emissions data demonstrating compliance with this condition as part of the monthly commissioning status report (**AQ-80**).

- Page 4.1-92, Condition of Certification AQ-87

AQ-87 For each calendar month and each rolling 12-calendar-month period, the project owner shall maintain records on a calendar monthly basis, of aggregate mass emissions of NO_x (calculated as NO₂), CO, PM₁₀, and PM_{2.5}, in tons, for the emission units described in District Permits to Operate No. 791, 792, and 793. These records shall be made available for inspection within 15 calendar days after the end of each calendar month. [Rules 20.3(d)(3), 20.3(d)(8) and 21]

Verification: The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

- Page 4.1-93, Condition of Certification AQ-89

AQ-89 For each combustion turbine, the project owner shall submit the following notifications to the District and U.S. EPA, Region IX:

- a. A notification in accordance with 40 CFR Section 60.7(a)(1) delivered or postmarked not later than 30 calendar days after construction has commenced;
- b. A notification in accordance with 40 CFR Section 60.7-(a)(3) delivered or postmarked within 15 calendar days after initial startup; and
- c. An Initial Notification in accordance with 40 CFR Section 63.6145(c) and 40 CFR Section 63.9(b)(2) submitted no later than 120 calendar days after the initial startup of the turbine.

In addition, the project owner~~applicant~~ shall notify the District when: (1) construction is complete by submitting a Construction Completion Notice before operating any unit that is the subject of this permit, (2) each combustion turbine first combusts fuel by submitting a First Fuel Fire Notice within five calendar days of the initial operation of the unit, and (3) each combustion turbine first generates electrical power that is sold by providing written notice within 5 days of this event. [Rules 24 and 21 and 40 CFR Part 75, 40 CFR Part 60 Subpart KKKK, 40 CFR Part §60.7, 40 CFR Part 63 Subpart YYYY, and 40 CFR Part §63.9]

Verification: ~~[Rules 24 and 21 and 40 CFR Part 75, 40 CFR Part 60 Subpart KKKK, 40 CFR Part §60.7, 40 CFR Part 63 Subpart YYYY, and 40 CFR Part §63.9]~~The project owner shall provide notification to the District and U.S. EPA Region IX as required by this condition and shall provide copies of these notifications as part of the final monthly commissioning status reports (**AQ-80**) due the month after the notifications are sent.

- Pages 4.1-93 and -94, Condition of Certification AQ-90

AQ-90 The engine shall be EPA certified to the 2009 model year or later requirements for emergency fire pump engines of 40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. [Rule 20.3(d)(1), 40 CFR Part 60 Subpart IIII], and 40 CFR Part 63 Subpart ZZZZ]

Verification: The project owner shall provide to the CPM for review and approval engine documentation demonstrating compliance with the condition at least 30 days prior to purchasing the engine.



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
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APPLICATION FOR CERTIFICATION
FOR THE **CARLSBAD ENERGY
CENTER PROJECT**

**Docket No. 07-AFC-6
PROOF OF SERVICE**
(Revised 1/28/2009)

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DECLARATION OF SERVICE

I, J. Mike Monasmith, declare that on January 29, 2010, I served and filed copies of the attached, Staff Errata comments, dated December 23, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

<http://www.energy.ca.gov/sitingcases/carlsbad/index.html>. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

X sent electronically to all email addresses on the Proof of Service list;

___ by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

X sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

___ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-6

1516 Ninth Street, MS-4

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I declare under penalty of perjury that the foregoing is true and correct.
